

WA 2302 3b  
3/31/88  
~~No Date~~

TRAINING PLAN

Both introductory and continuing training programs are provided to all employees involved in the handling of dangerous wastes. This training is provided within six months to new hires and to personnel transferred to new positions, and annually to all other personnel. Periodic training is conducted as needed when changes are made in the way dangerous wastes are handled. The objective of this training is to produce knowledgeable, effective, safety-minded individuals who can work with a minimum of supervision. The program teaches personnel to perform their duties in a way that ensures compliance with Washington State's Dangerous Waste Regulations. Dangerous waste management procedures, including contingency plan and plantwide emergency plan implementation, are tailored to the positions in which the individuals are employed. All employees are taught to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems. The training is provided in a general or intensive form, depending upon the relevance of the topic to the specific job classification. Depending on the nature of the training to be achieved, instruction consists of off-site short courses or university level courses, informal on-site safety meetings or training sessions, or on-the-job training sessions.

Liberal use is made in the training of audiovisual materials and well-illustrated, clearly written explanatory printed matter. Most of the training falls into the following five categories: personnel safety, release prevention and response, decontamination procedures, facility operation and maintenance, and maintaining documentation. Instruction is provided by personnel familiar with the aspect of dangerous waste management being taught. Plantsite informal and on-the-job training may be taught by anyone from Environmental Coordinator to department foremen, depending upon the topic and intensity of training.

The training program is reviewed annually by the Environmental Coordinator and appropriate members of supervision.

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Obtained at 3/31/88  
RCRA inspection  
J. Parkman

## TRAINING PROGRAM TOPICS

### I. Personal Safety

#### 1. Chemistry of hazardous materials and wastes

- a. Basic concepts of the chemistry of hazardous materials and wastes
- b. Classification of hazardous materials based on the correlation of hazard to physical and chemical properties
- c. Physical and chemical properties for general hazard classes
- d. Chemical aspects of handling, storage, treatment, and disposal of hazardous wastes
- e. Acquisition and utilization of chemical data

Limited training on this topic would be provided for less technical personnel and would include:

- a. Recognition of potential chemical hazards
- b. Reporting of chemical hazards to the proper on-site personnel
- c. Chemical aspects of specific jobs including handling of hazardous wastes and use of safe job procedures

#### 2. Health effects

- a. Recognition of potential health hazards
- b. Reporting of potential health hazards
- c. Health effects of materials handled

#### 3. Selection and use of personal and protective clothing and equipment

- a. Location and availability of clothing and equipment
- b. What equipment to use for particular hazards
- c. Complete training concerning plant's respiratory protective equipment program
- d. Care of protective equipment
- e. Limitations of protective equipment

## II. Release Prevention and Response

All employees will receive training which will enable them to effectively carry out those aspects of the plant's contingency plan in which they might be involved. For example: the Environmental Coordinator at the plant will receive comprehensive training in emergency response including:

1. Emergency preparedness
2. Implementation of site evacuation plan
3. Effective use of safety equipment and communication devices
4. First aid
5. Fire fighting

The training program for all plant personnel on jobs related to hazardous waste management will include as appropriate:

1. Handling procedures and storage so as to avoid contaminating the environment or hazard to human health
2. Types and use of emergency equipment and communication devices on the plantsite
3. Execution of contingency plan
4. First aid
5. Locations of first aid stations and kits, safety showers, eye wash stations, communication systems, and fire fighting equipment, personal protective clothing and equipment
6. Plant evacuation routes
7. Reporting mechanisms to be followed in case of emergencies
8. Emergency drills
9. Fire fighting
10. Shutdown of operations
11. Procedures for inspecting emergency equipment
12. Response to ground water contamination and human health incidents
13. Proper operation of trucks, forklifts, or any other machinery to be used in waste handling

### III. Decontamination Procedures

#### 1. Personal hygiene

- a. Importance of preventing hair from touching sealing surface of respirator
- b. No street clothes to be contaminated with waste material
- c. Eating to be confined to area isolated from hazardous materials
- d. Lunch rooms to be kept clean and free of contamination
- e. Hands to be washed thoroughly before eating, drinking, or smoking.
- f. Supervisors are to be notified of any condition which would preclude wearing of respirators or of other personal protective equipment

#### 2. Spill cleanup procedures

- .. Thorough training provided on implementation of contingency plan as affects spill cleanup.

#### IV. Facility Operation and Maintenance

1. Types and quantities of materials allowed in facility
2. Storage locations within facility
3. Use of log book for incoming and outgoing material
4. Reasons for regular inspections of containers, facility, and emergency equipment
5. Items to be checked for during daily and weekly inspections
6. Actions to take if leaking drums occur
7. Actions to take if drainage system malfunctions
8. What to do if signs of erosion, leaks, or spills are present
9. Design of sewer system in vicinity of facility
10. Procedures for cleaning concrete pad
11. Routine housekeeping procedures

## V. Maintaining Documentation

Appropriate personnel receive training on the following: .

1. Contingency plan records
2. Daily and weekly facility inspections
3. Use of the manifest system
4. Developing and maintaining training records
  - a. Job titles and classification
  - b. Job duties and descriptions
  - c. Personnel names
  - d. Personnel training records
5. Labeling and placarding
6. Incident recording
7. Operating log
8. Analytical data collection and chain of custody procedures
9. Waste acceptance notices from sites receiving plants' wastes
10. Contracts for disposing of wastes
11. Annual reports and exception reports
12. Retention times for documentation

## WEEKLY RCRA FACILITY/CONTAINER/EMERGENCY EQUIPMENT INSPECTION REPORT

### Facility and Containers

1. Is there erosion or signs of leakage or spills on surrounding ground? Yes/No
2. Is drainage system working? Yes/No
3. Is material lower than 2 feet from top of wall and is volume of strainer solids less than 4500 gallons (10 feet from back wall)? Yes/No
4. Are materials stored in proper sections as indicated by signs? Yes/No
5. Do structural components of facility show cracking, eroding, or leakage of any kind? Yes/No
6. Do any containers show signs of leakage, damage, or deterioration caused by corrosion or other factors? Yes/No

### Emergency Equipment

Check to make sure that the following equipment is present in quantity listed, is stored in proper location, and is in good working condition. A check (✓) indicates that no problem was found.

- ( ) Drum overpacks (2). Stored in meal bins.
- ( ) Empty open top metal drums, 17C or E (6). Stored in meal bins.
- ( ) Drum transfer pumps, hand operated (2). Stored in shop and 300 area.
- ( ) Air operated diaphragm pumps; 1, 2, and 3-inch Sandpiper (4). Stored in shop.
- ( ) Sump pump spare parts. Stored in shop.
- ( ) Oil absorbing sheets (50-100). Stored in D.C. warehouse.
- ( ) Sandbags (20). Stored in D.C. warehouse.
- ( ) Shovels (5). Stored at RCRA facility and in shop.
- ( ) Tank, portable, stainless steel, with wheels, dip pipe, and flame arrester.

Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Time: \_\_\_\_\_

Comments/Action (Must be filled in if any problem is noted above. Dates must be included for remedial actions taken.)

Instructions: The inspection is to be conducted weekly by the Environmental Superintendent or by a person appointed by him. Thoroughly investigate each item and note on this form any deficiencies and remedial actions taken. Problems which could result in a health or environmental hazard should be remedied immediately.

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JOB TITLES FOR JOBS RELATED TO HAZARDOUS  
WASTE MANAGEMENT

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**Job Title - Vanillin Department Operating Superintendent  
(also Materials Handling Supervisor)**

Directs personnel training program involving the handling of hazardous wastes. Supervises materials handling department. Is familiar with hazardous waste management procedures in general and with all aspects of handling the material this plant has on the site.

**Job Title - Distribution Center Foreman**

Handles shipping of materials offsite to users or land fill. Decides when to ship based on his/her own observations or on instructions from the Materials handling Supervisor or facility inspectors. Handles manifesting procedures and compliance with transportation requirements.

**Job Title - Shipper/Receiver**

Physically handles material stored in the facility. Is responsible for locating material properly within the facility and for maintenance functions such as hosing of the cement pad and pumping out of sumps. Is familiar with all plant safety procedures including those pertaining to fork lift operation and wearing of protective clothing.

✓ **Job Title - TSD Superintendent**

Functions as emergency spill coordinator and as such is responsible for providing training in the handling of hazardous and non-hazardous chemical spills. Acts as plant environmental coordinator and has responsibility for RCRA, NPDES, air, and water compliance of site with current local, state, and federal regulations. Is the plant's primary interface with governmental agencies. Inspects the RCRA facilities on plant site.

✓ **Job Title - Environmental/Industrial Hygiene Senior Chemist**

Coordinates the analytical work of generated waste. Inspects the RCRA facilities on plant site. Provides assistance in all environmental areas - RCRA, NPDES, air, and water compliance.

**Job Title - Lead Shipper/Receiver**

Provides support for D.C. foreman in the area of manifest procedure requirements and transportation compliance. Arranges for site maintenance and shipping of materials to landfill or processors for re-use.